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October 5, 2012

By ECF

The Hon. John Gleeson  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

***Re: United States v. Agron Hasbajrami,  
11 Cr. 623 (JG)***

Dear Judge Gleeson:

We represent Defendant Agron Hasbajrami in the above-referenced matter and write to respectfully request a brief one-month adjournment of the sentencing hearing and the deadline for sentencing-related submissions in the above-referenced matter. This request is made jointly on behalf of both the defendant and the Government.

As this Court is aware, on April 12, 2012, the defendant pleaded guilty to Count Two of the Superseding Indictment, which charged him with attempting to provide material support to terrorists in violation of 18 U.S.C. § 2339(A). At the conclusion of the plea hearing, this Court scheduled sentencing for September 14, 2012, but reserved judgment on whether to accept the defendant's plea and directed the parties to file submissions, jointly or separately, pursuant to U.S.S.G. § 6B1.2. Said hearing and submissions were thereafter adjourned by approximately 30 days to October 19, 2012, at 2:00 p.m., and October 8, 2012, respectively.

On September 20, 2012, the defense submitted to the Probation Department its objections to the defendant's Pre-Sentence Report ("PSR"). Similarly, on September 28, 2012, the Government provided the Probation Department with a joint agreed stipulation regarding additional modifications to the defendant's PSR. To date, however, the parties still await confirmation regarding whether the Probation Department will accept the parties' objections or whether further litigation will be required. Similarly, the Probation Department has yet to complete its revised PSR.

Wherefore, defense counsel on behalf of both parties, respectfully request that sentencing be adjourned until November 19, 2012, at 2:00 p.m., or a date and time convenient to the Court. The parties also request that they be permitted until November 8, 2012, to file joint or separate submissions regarding U.S.S.G. § 6B1.2.

The Hon. John Gleeson  
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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MKB', with a long, sweeping horizontal line extending to the right.

Michael K. Bachrach  
Steve Zissou  
*Attorneys for Defendant Adgron Hasbajrami*

MKB/mb

cc: AUSA Seth DuCharme